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FILED BY ECF

Hon. Marcia M. Henry
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Pedro Martinez v. Pure Green NYC Wholesale Corp.*
Case No. 23-cv-4247-NRM-MMH

Dear Judge Henry:

We represent plaintiff Rasheta Bunting in the above-referenced action. Pursuant to Your Honor's Individual Practices, we write with the consent of counsel for defendant, Pure Green NYC Wholesale Corp., respectfully to request that the Court adjourn the Initial Conference scheduled for November 30, 2023 at 9:00 a.m. while Defendant's motion to dismiss is pending before the Court. Defendant's letter motion for a pre-motion conference was submitted to the Court on September 20, 2023 [Dock. # 14] and Plaintiff's opposition was submitted on September 21, 2023 [Dock. # 15], and disposition of the motion will determine the scope of discovery in this matter, if discovery is needed at all.

Accordingly, counsel for Plaintiff submits that an adjournment of the Initial Conference until after Defendant's motion to dismiss is decided would preserve both the parties' and the Court's resources.

This is the Plaintiff's second request to adjourn the Initial Conference. The first request was made on September 5, 2023 [Dock. #12] due to Plaintiff's counsel being out of the country. As noted above, Defendant's counsel has consented to this request.

We thank the Court in advance for its consideration of this request.

Respectfully submitted,
/s/ Dan Shaked
Dan Shaked

cc: Counsel for Defendant (via email and ECF)